

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CR. NO. 1:24-CR- 00095
:
v. : (JUDGE CONNER)
:
EDWARD CLOUSER, :
Defendant :

I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT 1
18 U.S.C. § 2252A(a)(2)
(Distribution of Child Pornography)

On or about November 28, 2022, in the Middle District of
Pennsylvania, and elsewhere, the defendant,

EDWARD CLOUSER,

did, using a means and facility of interstate and foreign commerce,
willfully and knowingly distribute and attempt to distribute any child
pornography, as defined in Title 18, United States Code, Section
2256(8), that had been mailed and shipped and transported in
interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)
and 2252A(b)(1).

FILED
HARRISBURG, PA

APR 10 2024

PER IBc
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THE GRAND JURY FURTHER CHARGES:

COUNT 2

18 U.S.C. § 2252A(a)(5)(B)
(Possession of Child Pornography)

On or about February 7, 2023, in Cumberland County, in the
Middle District of Pennsylvania, the defendant,

EDWARD CLOUSER,

knowingly possessed material, namely, a Samsung Galaxy A03s cellular
telephone (Model SM-S134DL) and an AT&T Axia cellular telephone
(Model QS5509A), which contained images of child pornography as
defined in Title 18, United States Code, Section 2256(8)(A), including
images involving a prepubescent minor and a minor who had not
attained 12 years of age, such images having been produced using
materials that had been shipped and transported in and affecting
interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections
2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

The Grand Jury further finds probable cause that:

Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Section 2252A, the defendant, **EDWARD CLOUSER**, shall forfeit to the United States:

- a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or

traceable to gross profits or other proceeds obtained from the offenses; and

- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

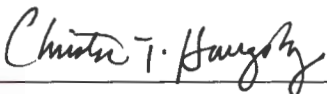
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 2253(b).

A TRUE BILL

GERARD M. KARAM
United States Attorney


FOREPERSON


CHRISTIAN T. HAUGSBY
Assistant United States Attorney

4/10/2024
Date